

FILED

07 DEC 12 PM 4:49

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY:

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

'07 CR 3355 LAB

UNITED STATES OF AMERICA,	)	Criminal Case No. _____
	)	
Plaintiff,	)	<u>I N D I C T M E N T</u>
	)	
v.	)	Title 8, U.S.C.,
	)	Sec. 1324(a)(2)(B)(ii) -
LORI STAUFFER (1),	)	Bringing in Illegal Aliens for
MARK NEEL (2),	)	Financial Gain; Title 8, U.S.C.,
	)	Sec. 1324(a)(2)(B)(iii) -
Defendants.	)	Bringing in Illegal Aliens Without
	)	Presentation; Title 18, U.S.C.,
	)	Sec. 2 - Aiding and Abetting

The grand jury charges:

Count 1

On or about November 12, 2007, within the Southern District of California, defendants LORI STAUFFER and MARK NEEL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Modesto Morales-Castillo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

CJB:nlv:San Diego  
12/10/07

Count 2

On or about November 12, 2007, within the Southern District of California, defendants LORI STAUFFER and MARK NEEL, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Modesto Morales-Castillo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii), and Title 18, United States Code, Section 2.

DATED: December 12, 2007.

A TRUE BILL:

  
Foreperson

KAREN P. HEWITT  
United States Attorney

By: 

CARLA J. BRESSLER  
Assistant U.S. Attorney